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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

Case No. MD-15-02641-PHX-DGC

**ERRATA TO APPLICATION BY
RAMON ROSSI LOPEZ TO SERVE
AS LEAD AND LIAISON COUNSEL
AND CHAIR OF PLAINTIFFS'
STEERING COMMITTEE**

Pursuant to this Court's Order Setting Initial Case Management Conference, dated September 15, 2015, paragraph 9, the undersigned, Ramon Rossi Lopez, founding and managing partner of Lopez McHugh LLP, submitted his Application to serve as Co-Lead and Liaison Counsel for Plaintiffs, as well as the Chair of the Plaintiffs' Steering Committee (hereinafter "Application"), in the above-entitled Multidistrict Litigation, No. 2641 (hereinafter, "MDL No. 2641" and/or "this MDL"), on October 9, 2015 [Docket 175]. I am submitting this "Errata" to my Application to inform the Court that Troy Brenes, referenced in my October 9, 2015 Application to the Court, departed from Lopez McHugh on October 20, 2015 to start his own practice.

As outlined in my Application for the Court, I want to reiterate that in addition to my involvement, Lopez McHugh has a robust team of attorneys and a full staff working diligently on this case on a daily basis, including other associate lawyers with a vast amount of experience in handling every aspect of these kinds of complex medical device cases. My partner, James J. McHugh, Jr. of our Pennsylvania office, Regina Johnson, the attorney who manages our New

1 Jersey office, and Matthew R. Lopez of our California office, have also been actively involved in this
2 litigation over the past several months, and will be involved in various aspects of this case moving
3 forward. They and others within all three offices of our firm will provide support for all that is needed
4 to assist me in fulfilling my responsibilities and duties as co-Lead/Liaison Counsel and Chair of the
5 Plaintiffs' Steering Committee. Moreover, they will also be available to support other projects involved
6 in the numerous committees and subcommittees that have been formed and currently in process as we
7 begin this MDL Proceeding.

8
9 RESPECTFULLY SUBMITTED this 21st day of October, 2015.

10 LOPEZ McHUGH LLP

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12 By: 

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